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FIDELITY NATIONAL TITLE INSURANCE COMPANY

**DESIGNATED LOCAL COUNSEL FOR SERVICE OF  
PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)**

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**UNITED STATES DISTRICT COURT**

## DISTRICT OF NEVADA

## WELLS FARGO BANK, N.A.,

**Plaintiff,**

VS.

FIDELITY NATIONAL TITLE GROUP,  
INC. et al.

## Defendants

Case No.: 2:21-CV-00996-APG-DJA

**STIPULATION AND ORDER TO TO  
EXTEND TIME TO REPLY IN  
SUPPORT OF MOTION TO DISMISS  
(ECF NO. 44)**

## FIRST REQUEST

COMES NOW defendant Fidelity National Title Insurance Company (“Fidelity”) and plaintiff Wells Fargo Bank, N.A. (“Wells Fargo”), by and through their respective attorneys of record, which hereby agree and stipulate as follows:

1. On May 24, 2021, Wells Fargo filed its complaint in the Eighth Judicial District

1 Court for the State of Nevada (ECF No. 1-1);

2 2. On May 24, 2021, Fidelity removed the instant case to the United States District

3 Court for the State of Nevada (ECF No. 1);

4 3. On October 20, 2021, Fidelity moved to dismiss Wells Fargo's complaint (ECF  
5 No. 27);

6 4. On December 3, 2021, Wells Fargo opposed Fidelity's motion to dismiss (ECF No.  
7 44);

8 5. Counsel for Fidelity requests a 31-day extension to reply in support of its motion to  
9 dismiss, such that Fidelity's reply shall be due on January 10, 2022, to afford Fidelity's counsel  
10 additional time to review and respond to Wells Fargo's opposition.

11 6. Counsel for Wells Fargo does not oppose the requested extension;

12 7. This is the first request for an extension made by counsel for Fidelity, which is  
13 made in good faith and not for the purposes of delay.

14 **IT IS SO STIPULATED** that Fidelity's reply in support of its motion to dismiss is hereby  
15 extended through and including Monday, January 10, 2022.

16 Dated: December 6, 2021

SINCLAIR BRAUN LLP

17 By: /s/-Kevin S. Sinclair

18 KEVIN S. SINCLAIR  
19 Attorneys for Defendant  
FIDELITY NATIONAL TITLE INSURANCE  
COMPANY

20 Dated: December 6, 2021

WRIGHT FINLAY & ZAK, LLP

21 By: /s/-Lindsay D. Dragon

22 LINDSAY D. DRAGON  
23 Attorneys for Plaintiff  
WELLS FARGO BANK, N.A.

24 **IT IS SO ORDERED.**

25 Dated this 7th day of December, 2021.



26  
27 ANDREW P. GORDON  
28 UNITED STATES DISTRICT COURT JUDGE